

No. 19-1205

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,

Petitioner,

v.

**AMERICAN EAGLE PROTECTIVE SERVICES CORPORATION
and PARAGON SYSTEMS, INC.,**

Respondents.

**RESPONDENTS' UNOPPOSED MOTION
FOR EXTENSION OF DEADLINES**

Respondents American Eagle Protective Services Corporation and Paragon Systems, Inc. (collectively, “Respondents”) respectfully move the Court for a 90-day extension of all remaining deadlines in this appeal. Petitioner National Labor Relations Board (“Petitioner”) is not opposed to this requested extension.

Respondents’ opening brief, which is the first brief scheduled to be filed in this matter, is currently due on January 15, 2020. *See* Amended Order filed Dec. 13, 2019, Doc. No. 1820129. Petitioner’s brief is due on February 14, and

Respondents' reply brief is due on March 6. *See id.* Oral argument has not been scheduled. Respondents request that these and any other remaining deadlines in this matter be extended by 90 days to allow the parties to work to resolve their dispute amicably. The parties are currently taking part in the Court's Appellate Mediation Program. They hope to resolve all disputes between them without the need for the Court to rule on the merits of this matter. Respondents accordingly seek this extension to preserve the parties' and the Court's resources.

CONCLUSION

For the foregoing reasons, Respondents respectfully request a 90-day extension of all remaining deadlines in this appeal.

Dated: December 20, 2019

Respectfully submitted,

/s/ Jeremy W. Hays

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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2019, I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will electronically serve the foregoing on the following counsel of record for Petitioner:

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/s/ Jeremy W. Hays

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CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limitation of Federal Rule of Appellate Procedure (“Rule”) 27(d)(2)(A) because the motion contains 186 words, excluding the parts of the motion exempted by Rule 32(a)(7)(B)(iii).

This motion complies with the typeface requirements of Rule 32(a)(5) and the type style requirements of Rule 32(a)(6) because the motion has been prepared in proportionally spaced typeface using Microsoft Word 2010 in Times New Roman 14-point font.

/s/ *Jeremy W. Hays*

Jeremy W. Hays

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